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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

ESTATE OF RAFAEL RAMIREZ LARA, deceased,
by and through PATRICIA RAMIREZ; PATRICIA
RAMIREZ; RAFAEL RAMIREZ; and JENNIFER
RAMIREZ,

Plaintiffs,

v.

COUNTY OF MONTEREY; SHERIFF STEVE
BERNAL, in his individual and official capacity;
JAMES BASS, in his individual and official
capacity; JOHNATHAN THORNBURG, in his
individual and official capacity; RAY TONGOL, in
his individual and official capacity; J. TEJEDA;
WELLPATH; KIP HALLMAN; JORGE
DOMINICIS; THOMAS PANGBURN; PAUL
FRANCISCO; RAYMOND HERR and CHRISTINA
KAUPP,

Defendants.

Case No.: 4:21-cv-02409-PJH

**JOINT NOTICE OF SETTLEMENT;
[PROPOSED] ORDER**

Trial Date: February 27, 2023

TO THE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Plaintiffs ESTATE OF RAFAEL RAMIREZ LARA, deceased, by and through PATRICIA RAMIREZ; PATRICIA RAMIREZ; RAFAEL RAMIREZ; and JENNIFER RAMIREZ, and Defendants COUNTY OF MONTEREY; SHERIFF STEVE BERNAL, in his individual and official capacities; JAMES BASS, in his individual and official capacity; JOHNATHAN THORNBURG, in his individual and official capacity; RAY TONGOL, in his individual and official capacity; and J. TEJEDA, (collectively “County of Monterey Defendants”); and Defendants WELLPATH; KIP HALLMAN; JORGE DOMINICIS; THOMAS PANGBURN; PAUL FRANCISCO, RAYMOND HERR, and CHRISTINA KAUPP (collectively, “Wellpath Defendants”), have agreed to a settlement of this matter. The Parties are in the process of executing written settlement agreements. For this reason, the Parties request that all trial and pretrial dates and related deadlines be taken off calendar, with the Parties to execute final settlement agreements within 30 days of today, and Plaintiffs to file a notice of dismissal of the action within 60 days. The Parties request that, upon dismissal, the Court retain jurisdiction to enforce the settlement agreement reached in this matter.

Respectfully Submitted,

Dated: September 30, 2022

RIFKIN LAW OFFICE

By: /s/ Lori RifkinLori Rifkin
Attorney for Plaintiffs

Dated: September 30, 2022

COUNTY OF MONTEREY COUNTY COUNSEL

By: /s/ Ellen S. LyonsJanet L. Holmes, Assistant County Counsel
Ellen S. Lyons, Deputy County Counsel
Attorneys for COUNTY OF MONTEREY
Defendants

Dated: September 30, 2022

BERTLING LAW GROUP

By: /s/ Jemma Parker SaundersPeter G. Bertling
Jemma Parker Saunders
Attorneys for WELLPATH Defendants

[PROPOSED] ORDER

The Court, having considered the Parties' above joint notice and good cause appearing,
ORDERS as follows:

All trial and pretrial dates and deadlines are taken off calendar with the Parties to execute
final settlement agreements within 30 days, and Plaintiffs to file a notice of dismissal of the
action within 60 days. The Court shall retain jurisdiction to enforce the settlement agreed to by
the Parties in this matter.

IT IS SO ORDERED.

Dated: _____, 2022.

PHYLLIS J. HAMILTON
United States District Judge